

1 WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@bsfllp.com)  
2 STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@bsfllp.com)  
3 NICHOLAS A. WIDNELL (*Pro hac vice*)  
(nwidnell@bsfllp.com)  
4 BOIES SCHILLER FLEXNER LLP  
5 1401 New York Avenue, NW, Washington, DC 20005  
6 Telephone: (202) 237-2727; Fax: (202) 237-6131

7 RICHARD J. POCKER #3568  
(rpocker@bsfllp.com)  
8 BOIES SCHILLER FLEXNER LLP  
300 South Fourth Street, Suite 800, Las Vegas, NV 89101  
9 Telephone: (702) 382-7300; Fax: (702) 382-2755

10 DONALD J. CAMPBELL #1216  
(djcc@campbellandwilliams.com)  
11 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
12 CAMPBELL & WILLIAMS  
13 700 South 7th Street, Las Vegas, NV 89101  
14 Telephone: (702) 382-5222; Fax: (702) 382-0540

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
16 *Ultimate Fighting Championship and UFC*

17 [Additional Counsel Listed on Signature Page]

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
21 Vera, Luis Javier Vazquez, and Kyle  
22 Kingsbury on behalf of themselves and all  
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting  
26 Championship and UFC,

27 Defendant.  
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT STIPULATION  
REGARDING PLAINTIFFS'  
EMERGENCY MOTION TO  
RESCHEDULE DEPOSITIONS  
AND EXTENSION OF TIME TO  
FILE ZUFFA, LLC'S REPLY IN  
RESPONSE TO PLAINTIFF'S  
OPPOSITION TO ZUFFA'S  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT AS TO  
PLAINTIFF NATHAN QUARRY  
(Second Request)**

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and  
2 Kyle Kingsbury (collectively “Plaintiffs”) and Defendant Zuffa, LLC d/b/a Ultimate Fighting  
3 Championship and UFC (“Zuffa”) (together with Plaintiffs, “the Parties”) have entered into this  
4 stipulation in order to resolve certain scheduling disputes between the parties regarding  
5 depositions to be taken as well as to stipulate to extend the time in which Zuffa may file a reply in  
6 response to Plaintiffs’ Opposition to Zuffa’s Motion for Partial Summary Judgment as to Plaintiff  
7 Nathan Quarry (ECF No. 365) (“Plaintiffs’ Opposition”).  
8

9 WHEREAS Plaintiffs filed an emergency motion to reschedule the depositions of  
10 Kirk Hendrick and Lawrence Epstein on April 21, 2017 (see ECF No. 377);

11 WHEREAS, this is the second stipulation to extend the time to respond with respect  
12 to Zuffa’s Motion for Partial Summary Judgment as to Plaintiff Nathan Quarry (ECF No. 347)  
13 and the original deadline for the reply to Plaintiffs’ opposition was April 24, 2017;

14 WHEREAS, the Parties have been engaged in extensive fact discovery and still  
15 have outstanding disputes regarding whether certain documents are privileged as well as when  
16 certain depositions of Zuffa deponents may be taken;

17 WHEREAS, the Parties have determined that is in their mutual interest to avoid  
18 costly and inefficient motion practice regarding the taking of certain depositions of Zuffa  
19 witnesses; and  
20

21 WHEREAS, Zuffa has moved to extend the deadline to file its reply to Plaintiffs’  
22 Opposition (ECF No. 381).  
23

24 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
25 the Parties as follows:

26 1. The parties stipulate to a one-week extension for Zuffa’s reply to Plaintiffs’  
27 Opposition such that Zuffa’s reply will be due on Monday, May 1, 2017.  
28

2. Plaintiffs may take the deposition of Zuffa employee Ike Lawrence Epstein outside the period ordered for fact discovery. Such deposition will be set at a mutually agreeable time for the parties and will take place in May 2017.

3. If the Court has not yet ruled on Plaintiffs' Motion to Challenge Work Product Designation (ECF No. 282) ("Work Product Challenge") by the time Mr. Epstein's deposition is taken, Plaintiffs may hold open Mr. Epstein's deposition for the limited purpose of deposing Mr. Epstein concerning any de-privileged documents Zuffa may produce as a result of the Work Product Challenge where Mr. Epstein is the author or recipient of such documents. Should the Court grant Plaintiffs' Work Product Challenge, Plaintiffs shall be allowed no more than two (2) hours to depose Mr. Epstein regarding fighter compensation issues, including the Mercer documents. The total time on the record for Mr. Epstein's deposition shall not exceed seven (7) hours.

4. Plaintiffs may take the deposition of Kirk D. Hendrick at a mutually agreeable time at Mr. Hendrick's convenience.

5. If the Court has not yet ruled on Plaintiffs' Work Product Challenge by the time Mr. Hendrick's deposition is taken, Plaintiffs may hold open Mr. Hendrick's deposition for the limited purpose of deposing Mr. Hendrick concerning any fighter compensation issues, including any documents related to the Mercer study Zuffa performed. Plaintiffs shall be allowed up to three (3) hours to depose Mr. Hendrick regarding the Mercer documents. The total time on the record for Mr. Hendrick's deposition shall not exceed seven (7) hours.

6. Zuffa's agreement to take the depositions of Mr. Epstein and Mr. Hendrick after the deadline for fact discovery is limited to these two depositions. Zuffa does not consent to any extension of the deadline of fact discovery for any other purpose. Plaintiffs reserve their rights to seek extensions from the Court regarding other depositions.

8. Plaintiffs' emergency motion to reschedule depositions (ECF No. 377) is hereby withdrawn.

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED: \_\_\_\_\_

Dated: April 25, 2017

Dated: April 25, 2017

**JOSEPH SAVERI LAW FIRM, INC.**

**BOIES SCHILLER FLEXNER LLP**

By: /s/ Matthew S. Weiler

By: /s/ Stacey K. Grigsby

Joseph R. Saveri (State Bar No. 130064)  
 Joshua P. Davis (admitted *pro hac vice*)  
 Matthew S. Weiler (admitted *pro hac vice*)  
 Kevin E. Rayhill (admitted *pro hac vice*)  
 555 Montgomery Street, Suite 1210  
 San Francisco, California 94111  
 Phone: (415) 500-6800/Fax: (415) 395-9940  
 jsaveri@saverilawfirm.com  
 jdavis@saverilawfirm.com  
 mweiler@saverilawfirm.com  
 krayhill@saverilawfirm.com

William A. Isaacson (admitted *pro hac vice*)  
 Stacey K. Grigsby (admitted *pro hac vice*)  
 Nicholas A. Widnell (admitted *pro hac vice*)  
 1401 New York Ave, NW, 11th Floor  
 Washington, D.C. 20005  
 Phone: (202) 237-2727/Fax: (202) 237-6131  
 wisaacson@bsflp.com  
 sgrigsby@bsflp.com  
 nwidnell@bsflp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a  
 Ultimate Fighting Championship and UFC*

*Co-Lead Counsel for the Classes and  
 Attorneys for Individual and Representative  
 Plaintiffs Cung Le, Nathan Quarry, Jon  
 Fitch, Luis Javier Vazquez, Brandon Vera,  
 and Kyle Kingsbury*

**CAMPBELL & WILLIAMS**

Donald J. Campbell (State Bar No. 1216)  
 J. Colby Williams (State Bar No. 5549)  
 700 South 7th Street  
 Las Vegas, Nevada 89101  
 Phone: (702) 382-5222/Fax: (702) 382-0540  
 djc@campbellandwilliams.com  
 jcw@campbellandwilliams.com

*Attorneys for Defendant Zuffa, LLC, d/b/a  
 Ultimate Fighting Championship and UFC*

**COHEN MILSTEIN SELLERS  
 & TOLL, PLLC**

**BOIES SCHILLER FLEXNER LLP**

Benjamin D. Brown (admitted *pro hac vice*)  
 Richard A. Koffman (admitted *pro hac vice*)  
 Daniel Silverman (admitted *pro hac vice*)  
 1100 New York Ave., N.W.,  
 Suite 500, East Tower  
 Washington, D.C. 20005  
 Phone: (202) 408-4600/Fax: (202) 408 4699  
 bbrown@cohenmilstein.com  
 rkoffman@cohenmilstein.com  
 dsilverman@cohenmilstein.com

Richard J. Pocker (State Bar No. 3568)  
 300 South Fourth Street, Suite 800  
 Las Vegas, Nevada 89101  
 Phone: (702) 382-7300/Fax: (702) 382-2755  
 rpocker@bsflp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a  
 Ultimate Fighting Championship and UFC*

*Co-Lead Counsel for the Classes and  
 Attorneys for Individual and Representative  
 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,  
 Luis Javier Vazquez, Brandon Vera, and Kyle  
 Kingsbury*

**BERGER & MONTAGUE, P.C.**

Eric L. Cramer (admitted *pro hac vice*)  
Michael Dell'Angelo (admitted *pro hac vice*)  
Patrick Madden (admitted *pro hac vice*)  
1622 Locust Street  
Philadelphia, Pennsylvania 19103  
Phone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net  
pmadden@bm.net

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative  
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,  
Luis Javier Vazquez, Brandon Vera, and Kyle  
Kingsbury*

**WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP**

Don Springmeyer  
Nevada Bar No. 1021  
Bradley S. Schrager  
Nevada Bar No. 10217  
Justin C. Jones  
Nevada Bar No. 8519  
3556 E. Russell Road, Second Floor  
Las Vegas, Nevada 89120  
(702) 341-5200/Fax: (702) 341-5300  
dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com  
jjones@wrslawyers.com

*Liaison Counsel for the Classes and Attorneys  
for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis  
Javier Vazquez, Brandon Vera, and Kyle  
Kingsbury*

**WARNER ANGLE HALLAM JACKSON  
& FORMANEK PLC**

Robert C. Maysey (admitted *pro hac vice*)  
Jerome K. Elwell (admitted *pro hac vice*)  
2555 E. Camelback Road, Suite 800  
Phoenix, Arizona 85016  
Phone: (602) 264-7101/Fax: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

*Counsel for the Classes and Attorneys for  
Individual and Representative Plaintiffs Cung  
Le, Nathan Quarry, Jon Fitch, Luis Javier  
Vazquez, Brandon Vera, and Kyle Kingsbury*

**LAW OFFICE OF FREDERICK S.  
SCHWARTZ**

Frederick S. Schwartz (admitted *pro hac vice*)  
15303 Ventura Boulevard, #1040  
Sherman Oaks, California 91403  
Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

*Attorneys for Plaintiffs*

**SPECTOR ROSEMAN KODROFF &  
WILLIS, P.C.**

Jeffrey J. Corrigan (admitted *pro hac vice*)  
William G. Caldes (admitted *pro hac vice*)  
1818 Market Street, Suite 2500  
Philadelphia, Pennsylvania 19103  
Phone: (215) 496-0300/Fax: (215) 496-6611  
jcorrigan@srkw-law.com  
wcaldes@srkw-law.com

*Attorneys for Plaintiffs*